## **To: Waste Management Staff**

Please take a few minutes to complete this document. You should know that some supervisors may call their staff together to discuss ideas and prepare a response for their Regional Team or Section. Other supervisors may ask you to answer the questions as individuals. We are asking for one or two ideas per question, not an exhaustive list, and suggest spending 30 minutes or less. Please send your response to Jane Washburn by July 25<sup>th</sup> if possible, but no later than Aug 1.

Waste Management Priorities and Streamlining Ideas July 2003	
This response represents (check one and insert initials of Regional Team or Section):  Regional Team/Subteam member 2 WC regional 1 SER  Section members Individual in 2 SCR 3 NER 4 NOR 3 SER 4 WCR Individual in 2 - Tech Support Policy 2 P & E Adm 3 Prog. Services	
Among your work activities, which have the greatest environmental benefit?	<ol> <li>Groundwater monitoring data shows trends in water quality surrounding monitoring sites; protects private and public drinking water</li> <li>Infectious waste reduction as reflected on the Infectious Waste Annual Report forms; public information via hospital/nursing home educational efforts</li> <li>On-site inspections</li> <li>Compliance-Surveillance</li> <li>-Water Quality issues about Landfills-Operational issues</li> <li>Answering complaints of illegal waste management activities</li> <li>Performing recycling audits</li> <li>Hazardous waste projects and rule revisions</li> <li>plan review assistance at SW landfill facilities(last fiscal year),         <ul> <li>RR liaison/consistency work (this fiscal year).</li> </ul> </li> <li>The infectious waste annual reports. They keep the wasteful health care sector actively looking for ways to reduce waste. The reports were also instrumental in getting medical facilities to voluntarily get rid of mercury.</li> <li>Medical waste technical assistance of all types (web information, calls, and e-mails)</li> <li>Policy work on the NR 507 subteam. Losing Donalea Dinsmore is going to really hurt that subteam because she has been our greatest resource for improving the quality of data and therefore the quality of decisions.</li> <li>Policy Interpretation</li> <li>Plan Review</li> <li>HW, RCY &amp; SW facility compliance and enforcement.</li> <li>Project Management of HW, RCY &amp; SW facilities/projects.</li> <li>Landfill operation &amp; construction inspections.</li> <li>Complaint response and follow up compliance/enforcement</li> <li>timely response to and resolution of illegal disposal complaints.</li> <li>review of plan of ops, etc. for regulated facilities to make sure they remain within regulatory limits for the environment, human health and safety</li> <li>plan review (ISI, ISR, feasibility, plan of operation, etc) of proposed landfills and landfill expansions</li></ol>

- landfills to determine which may be impacting groundwater. 2-Reviewing Feasibility Reports to assure locational criteria, setbacks, environmental monitoring are adequate and reviewing Plan of Operation landfill design and as-built reports to assure the design and construction are adequate to protect the environment
- 1- Regular inspections/enforcement on solid waste and recycling facilities.
- 2.Outreach to groups to provide increased knowledge of environmental effects of illegal activities and better waste mgmt
- 1- Siting plan review is proactive environmental protection
- 2- Technical sessions with peers because they lead to better plan review
- 1- Primary enforcement (Notices of Non-compliance) of facilities that operate outside of the code but regain compliance through timely actions.
- 2- Internal and external outreach that explain code requirements to develop consistent code interpretations internally and minimize externals potential for receiving NONs
- 1- C&D waste issues
- 1- Policy Development & Implementation
- 2- Training & Mentoring staff
- 1- Inspecting hazardous waste generators
- 1- Reviewing environmental monitoring data, in particular water supply sample data and deciding if further action is needed.
- 2- Developing adequate monitoring systems for landfill facilities 3-Ensuring that environmental impacts are minimized in siting new landfills
- 1- Plan Review reduces substandard landfill designs, reduces substandard construction, reduces poor quality submittals by incompetent engineering firms, eliminates poor quality contractors 2-Construction Inspections-improves construction
- 1- Programming & overseeing the processing to maintain an accurate & reliable hazardous waste manifest data system. Field staff, centralized staff, & the public use this data to make regulatory decisions all the time.
- 2- Programming & overseeing the processing to maintain & summarize our hazardous waste compliance data. Some of this is obligation to EPA, but field staff, centralized staff, & the public use this data to make regulatory decisions frequently
- 1- Landfill plan review. I am always amazed at the poor quality proposals submitted to the Department by certain "professional" engineers. I would hate to think of the disastrous outcome if these same engineers were practicing with nobody looking out for the average private citizen.
- 2-Hazardous waste inspections. While most of our work is focused on large and small quantity generators, these facilities generally have environmental personnel and do a good job of managing their hazardous waste. On the other hand, VSQGs generally are not well versed in hazardous waste management, which provides us a great opportunity to educate owners of these facilities to ensure proper management of, in some cases very large quantities, of hazardous waste.
- Reviewing environmental data for the public and identifying contamination problems before drinking water supplies are endangered.
- 2- Reviewing environmental reports and proposals for the public and

identifying misleading and/or untrue assertions that may allow contamination problems to occur. 1 Getting out in field and talking to people. Whether it is a compliant investigation, town board meeting, inspections. 2. Being involved in a program to divert large volumes of waste away from landfills - specifically NR 538 program 1 HW Generator inspections 2 complaint response Among your work activities, which 1- Reading emails have the least environmental 2. Administering NR 538 where there is no way to protect benefit? groundwater. The code requires that the use of industrial not have an adverse impact on groundwater, but there is no required separation distance or requirement for monitoring. 1 -EMS 2-Team Meetings 1 administrative services 2 workplanning Answering phones; copying 1-E-mail spam control 2- Meetings of a general nature, such as staff meetings 1-Long drive times to locations (some are 3/12 hr's) 2-Learning a new site, program or rule w/o assistance from previous manager or contact person. "loss of institutional knowledge." Especially in HW 1- Standing Team and WaMT meetings/work relating to internal policy & issues (effectiveness, accountability, workplanning etc.). 2- Division/Bureau workplanning activities. 3- Quarterly and other reporting to management and the bureau. 4- EMS policy and audit meetings and work. 1- compost/recycling facility inspections 2- questions from potential home buyers 1-Meetings to discuss process and non-technical issues 2-Reading through 10's of emails daily that only peripherally related to what I do 1- Team activities except where it is focused on program advancements. 2- Duplicative paperwork and tracking is a waste of time and does nothing for the environment 1-Although I see the benefit to management, the time it takes to figure out what time codes to use for my work 1- Secondary enforcement (NOV) that become bogged down in legal maneuvering to simply arrive at forfeiture settlements. 2- Time spent on statutory exempt issues (salvage industry, household waste, exempt fill) and time spent on issues that other programs have requirements in their codes (NR 500.08(3) exempt dredge, waste water sludge landspreading, stormwater run-off, Water supply well restrictions within 1200' of waste fills...) 1- Annual Monitoring Medical Waste processing facilities 1- E-mail management 2- Internal Planning Meetings 1- Following up on open burn compliants (should be local fire

departments/county responsibility).

tech staff

1-Addressing needs/design capacity issues in siting new landfills. 1- acknowledgement letter and invoicing should be done by none 2-quarterly reports, staff meetings

- 1- Attending meetings & conference calls & sifting through email as a regular member of the Hazardous Waste Team. There are few issues that I can give technical comments on. My participation could be changed to an "as needed" basis & limited to data management issues
- 1-MRF/yard waste composting facility inspections.
- 2-Complaint responses
- 1- Having to type my own paperwork, and conduct various clerical duties due to minimal support.
- 2-Explaining the content of administrative codes to "Environmental experts" and answering the numerous & lengthy general questions we receive in the highly populated portion of the state

Shuffling through volumes of paper and email. Even though email is a valuable tool sometimes it becomes overwhelming. And now with files coming to the regions there will be an increase in file maintenance and reduction in higher priority items.

1Responsible unit reviews

2 Teams

## Among your work activities, which have the **greatest value to stakeholders/the public**?

- 1-Groundwater monitoring data, and support to facilities/consultants and GEMS sub-team input
- 2-Infectious Waste Annual Report support
- 1 Timely review of plan submittals
- 1- Groundwater Quality Protection/Evaluation about operating and closed landfills
- 2-Compliance assistance
- 1- Answering complaints of illegal waste management activities
- 2- Performing recycling audits

Attending Regional and Statewide Meetings to foster cooperation among staff and consistency

- 1-Haz waste projects and rule revisions
- 2-Liason work with he R&R Bureau
- 1 Inspections
- 1- Technical assistance about infectious waste and hazardous wastes found in health care
- 2- Medical waste annual reports because waste reduction saves them money in the end.
- 3- Sharps collection program, maintaining the list of places to take sharps, helps reduce public health risks, particularly to waste handlers. We should do even more promotion of this program to help people in counties with only a few or no stations.
- 4- Special waste team, guidance on special wastes.
- 1-Technical interaction/outreach with consultants and academia
- 2-Rulewriting/Guidance Documents
- 1- Management of subteam staff and projects to assure that plan reviews and decisions are made in a timely, economical, and environmentally sound manner.
- 2- Construction inspections and timely resolution of construction issues.
- 3- Complaint response/enforcement relating to HW, RCY & SW issues.
- 4- Stakeholder meetings and outreach in Regions (includes WA EMS policy stakeholder meetings).
- 1- timely responses to public complaints or ongoing problems where the waste program has regulatory control.
- 2- Requests from the public on solid waste disposal, recycling, reuse

and waste reduction, plus cleansweep events, etc.

- 1-sharing information about landfills and landfill proposals at public meetings
- 2-environmental monitoring reviews esp. for groundwater contamination near private and public water supply wells
- 1- Determining whether landfills are impacting groundwater and especially nearby private wells and developing guidance to carry this out consistently.
- 2- Allowing facilities to enter data onto GEMS on the internet and check themselves to see if it is rejected and why, instead of having our staff spend time explaining the problems. (Facilities and consultants have asked for this too.) (Unfortunately, to do this requires lots of up front time and effort, but would be a big time-saver in the long run.)
- 1- Complaint response and follow-up/enforcement activities.
- 2- Work on waste reduction and advancing waste management philosophies
- 1-Review of siting related plans and evaluation of groundwater data (annual reports or audits) which is backed up by maintaining GEMS
- 2- Working on Web-based GEMS to allow public access to monitoring data, well information, and sampling schedules
- 1- Maintaining facility records for complete and accurate file reviews as well as reference tool for timely compliance assessments
- 2- Participating in development of approval determinations to assure the applicant complied with statutory elements. Assuring Dept. imposed conditions are written clearly and in an enforceable manner and subsequent tracking to assure conditions are complied with
- 1- Land Fill Operators certification
- 1- Review of Determinations (approvals, enf recommendations, plan reviews, etc.)
- 2- Priority setting/matching needs with time & talents
- 1-Providing technical assistance for emergency response plans
- 1-Limiting impacts to private water supply wells caused by landfills and associated facilities.
- 2-Ensuring that landfills are properly sited and that requirements are applied reasonably and consistently.
- 1-plan review-improves landfill design and construction and thereby protects the environment and human health
- 2-construction inspections especially during geomembrane installation- improves landfill construction
- 1- Programming & overseeing the processing to maintain a fully functional licensing data system for solid & hazardous waste activities.
- 2- Developing a wide range of standardized data summaries & explanatory materials for presentation on the Waste Management internet site.
- 1-Landfill plan review. It is much more efficient to deal with problems before they arise than to wait and deal with them through a response to a disaster and/or clean-up effort.
- 2-Complaint responses. Even though most of the complaints are not a significant threat to the environment, they do provide us with a great opportunity to get out and educate people, both private citizens and local government officials, in the best management practices of solid waste.
- 1-Working on the creation of web based GEMS for our diverse customer base.

- 2-Working on/coordinating the GEMS Subteam on tasks relating to electronic environmental data reporting, and enforcement.
- 3 Early identification of contamination problems saves our stakeholders the costs to remediate the problems if they went undetected for an extended period of time.
- 4 -Task oriented functions on the EMT, GEMS, and Private Well Subteams
- 1. Providing technical assistance to the general public and regulated community. Most if not all contacts are well received and improved relationship with the Department.
- 1 Complaint response
- 2. facility inspections

## Among your work activities, which have the **least value to stakeholders/the public**?

## 1-EMS

- 2-Bureacratic processes
- 1- Reading email messages
- 1- Administration activities
- 2- Work planning
- 1 -Office duties, e-mail
- 2-Some aspects of plan reviews, like Needs
- 1-Administrative activities
- 2-Department arguing & large egos
- 1- Standing Team and WaMT meetings/work relating to internal policy and issues noted above.
- 2- Quarterly and other reporting to management and the bureau.
- 3- Division/Bureau workplanning activities (not incl. Reg./Individual
- 1-travelling long distances for non-technical Department meetings
- 2-having well-paid engineers and hydros do work that high school students could do: e.g. compost site inspections, review of recycling reports.
- 1-Meetings to discuss process and non-technical issues
- 2-Technical staff working on non-technical issues
- 1- Nonmetallic mining audits.
- 2- Oversight of small ru's that are most likely not going to be able to achieve more than they already are.
- -1 Reviews that involve excessive submittal of addenda and extend the timeliness for issuing determinations particularly from non-lf applicants that are unfamiliar with submittal requirements
- 1- Annual Monitoring Medical Waste processing facilities
- 1- E-mail management
- 2- Internal Planning Meetings
- 1-Writing inspection reports several times in different forms
- 1-Emphasising the importance of miscellaneous meetings and training not directly related to our jobs.
- 2-Time sheets, activity tracking, quarterly reporting, workplanning etc.
- 1-acknowledgement letters and invoices
- 2-quarterly reports
- 1- Developing customized data reports & summary files to respond to very specific individual requests. This benefits the few individuals, but takes away time that could be spent making standardized information more widely available
- 1-Plan review of some non-landfill facilities
- 1-Clerical and/or mundane tasks (typing, copying, faxing, mailing, etc.) reduce the time available to review data and reports
- 1. Even though complaint response is of great value there are many

complaints that are just local spats/feuds that you sometimes don't know until you have spent time on it.

1. RU audits
2. Teams

Among **your work activities**, which have potential for streamlining, for an innovative regulatory approach or for saving time/money?

- 1- Groundwater Monitoring using electronic means (e-mail; Web)
- 2 -Infectious Waste review fee collection to Technical Services' Milwaukee 'lockbox", and Bureau of Finance's proposed Accounts Receivable information system cross-link to FIST/SHWIMS
- 1-Metallic Mine Permitting
- 2-Landfill Feasibilities
- 1-Clerical and data entry work could be done by dedicated staff (note salary differential between engineer/hydro vs. clerical/data entry. It just makes sense to have time spent on technical duties when being paid at a higher rate I do realize that this may not be feasible.).
- 1-Put more technical information and guidance on the web, especially about groundwater issues.
- 2-continue to improve the efficiency of IW annual report review.
- 3- Use E-mail announcements to reduce the need for staff meetings. Staff meetings are still useful but could be much shorter.
- 1-It saves a lot of time when management understands the technical merits of a project.
- 2-I feel the Department's level of professionalism has dropped off and consequently we don't provide as good of service and we waste a lot of time. A concerted effort needs to be made across the board to improve this
- 1- Plan review for regulated facilities.
- 2- Enforcement (stepped enforcement is inefficient and ineffective for many of our violations such as open burning; citations are needed).
- 3- Workplanning; individual workplans are important, but not the action plans and division/bureau workplanning/tracking
- 1- all the extraneous work involved in granting low hazard exemptions and beneficial reuse of waste materials i.e. review of submittals and all the legal approval language required (findings of facts, conditions, conclusion of law, etc.)
- 1-video conferencing would save travel time & \$\$
- 2-reinstate the idea of specialists to our program; hire LTEs, student interns, etc. to work on minor inspections, recycling work, etc.
- 1-Hire LTEs and interns to do non-technical related aspects of job such as minor inspections
- 2-Develop a GIS system so the public could click on a map where they plan to build or buy a house and obtain information about whether there is an abandoned landfill nearby and information about the landfill such as its size, wastes accepted, any remedial actions taken, etc.
- 1- Oversight of RU's should be traded at least partially for gaining oversight of businesses. We'd gain more than we will with the time we spend on RU's. Especially now with the budget cuts all municipalities are facing.
- 2- Tracking / paperwork.
- 1-Allow facilities to upload their own electronic data through the states data portal, allowing electronic certification of the data

- 1- Utilize professional certifications for construction documentation and non-precedent setting plan modification submittals in order to free up program PE/PG staff to review Feasibility and Plan of Operations and monitor external certifications. (utilizes certified program staff more efficiently in their area of expertise)
- 2- Provide ability for program staff to issue financial sanctions at primary enforcement (NON) as additional disincentive for operating outside of the code requirements (saves staff time and resources associated with secondary enforcement to obtain forfeitures)
- 1- Land Fill Operators certification
- 1- meetings (set goals prior to meetings, teleconference)
- 2- HW relicensing
- 1-Documenting inspections (do like Benjamin Benninghoff in SER Wastewater Pretreatment combined inspection checklist, memo, photo documentation).
- 1-Providing more "direct and specific" guidance to staff and the public to avoid having to deal with issues that should never have come up in the first place.
- 2-Streamling aspects of the landfill siting process to reduce the amount of money/time spent in developing reports and our review of them. This could include providing a specific format to address needs or specifying a maximum approval capacity and sticking with it. Another possibility would be specifying what can be included in an alternative geotechnical proposal.
- 3-Improving opportunities for technical training, on the job training for new staff and emphasizing the use of mentors. There may be other training options that could be employed to improve consistency across the state.
- 1-increase items that can be submitted as expedited plan mod BUT we need to charge some minimal fee for expediteds these are becoming a large work load and take up substantial amount of time (almost always more than 4 hours per total review time) with no revenue which we deperately need, also limit number of items that can be included in one formal plan mod.
- 2-charge a separate fee for each grant of exemption request included in feas, and POP
- 1- Making corrections in facility data records for data management errors done by regional staff. If staff are well-trained, competent, & reliable—my time can be spent on computer programming & system improvements.
- 1-Plan review of some non-landfill facilities
- 1-Clerical and/or mundane tasks (typing, copying, faxing, mailing, etc.) reduce the time available to review data and reports Providing guidance on an apparent increasing workload of dredging project review along with improving the communication link between WRZ & WA.

Putting a list of landfills (waste registry) on the web in a userfriendly format so when people purchase homes they can quickly find their location to a landfill.

2. Review recycling activities at businesses as part of hazardous waste generator inspections.

Among work activities in the Waste Management program as a whole, (or elsewhere in the Department), which have potential for streamlining,

- 1- Including more industrial byproducts or uses in NR 538.
- 1- Metallic Mine Permitting
- 2-Landfill Plan Modifications and Feasibilities
- 1- time sheet electronically submitted (too many steps...employee,

for an innovative regulatory approach or for saving time/money?

supervisor, data entry then to finance!!!)

- 2-reduce number of sections from 4 to 3. We will have 22 people (21 FTE) after the 4 employees who were at risk move to there new jobs (this number does not count LTE's). That would be 7FTE/section. With 4 sections, you have 5.25 FTE/section which is might be difficult to justify during a budget crisis.
- 1 NR 106 requires municipalities to work with medical facilities to reduce mercury discharges. Those medical facilities that have qualified for the H2E "Making Medicine Mercury Free"
- 1- Eliminate the < 50,000 yd3 C& D Landfills
- 2- Revise the intermediate Demolition landfill standards closer to MSW facilities
- 1- Performance tracking (way too many people in the Division in Madison doing this and not high priority work).
- 2- Restructure the WA/RR bureaus and the WA Sections/Teams to
- 1- eliminate overlap and redundancy of work and administration
- meetings and training sessions (use electronic and phone media instead) saves transportation, lodging and meal costs, plus significant time.
- 2- significant time lost following enacted protocol on using tracking systems overall (FIST, GEMS, SWHWIMS, etc.) takes too much time to get done; not enough support systems in place to answer questions, etc.
- 1- reinstate the idea of specialists, then hire LTEs, student interns, even recruit volunteers to work on minor inspections, recycling approvals, etc.
- 2-recentralize the important environmental protection functions of our program, such as plan review, environmental contamination review.
- 1- Centralize activities that are important to protect the environment such as plan review activities and review of environmental contamination to assure consistency and efficiency.
- 2-Hire LTEs and interns to do non-technical tasks
- 1- Tracking/paperwork combining of system to get rid of duplication, allowing for automated completion of inspection reports instead of handwriting and then entering in multiple systems.
- 1- Recentralize plan reviewers or locate them in smaller number of places to facilitate exchange of information
- 2- Restructure the program (Sections, Team leader duties, etc.) to more effectively deal with our "core" work
- 1- Develop information management systems that utilize user friendly "posting" protocols (ie not the w:drive) as opposed to the current reliance on "pushing" information out through e-mail to reduce information overload and assure accuracy of information being disseminated.
- 2- Improve communication (ie links) between data systems with other programs and bureaus (finance invoice processing, other program web pages that reference waste program requirements ...)

  3 Utilize electronic cc to minimize number of paper copies generated for program documents (but first develop "posting" option to eliminate individual e-cc).
- 1- filing (go to an electronic file system)
- 2- low-hazard exemptions (through further definition of low-haz materials)
- 1- Send out facility self-auditing hazardous inspection package to facilities and ask them to send back inspection form and photo

documentation (on random basis). Inspector can always do followup visit if necessary

- 1- minor environmental impact facilities such as small transfer facilities
- 2-Needs in feasiblity need good guidance
- 1- For any large mailings (various annual report materials, licenses, license renewal forms, etc.) we should routinely use the DNR "print-to-mail" services so people don't spend so much time stuffing envelopes. Also look at the possibilities of e-mailing materials rather than printing & regular mailing.
- 2- We should equip our Waste Program IT staff to fully maintain our database systems, including the interfaces (PowerBuilder, Oracle 6i, web programming). Mike Ellenbecker with the FIST system is a good model of what a capable programmer with an understanding of the Waste Program needs can accomplish in maintaining a data system & responding to user needs.
- 3- Eliminating the use of individual staff spreadsheets to track data more appropriately maintained in a department-wide database system.
- 1- The requirement for electronic copies of submitted reports, and data would reduce paper overload and storage problems.
- 2- The R&R program needs to store its environmental data electronically and maintain the GEMS database when they are working on the remediation of a waste facility.
- EMS is appears has taken an extreme amt of time from other activities. Is there a real benefit seen? This is likely a sacred cow and will not be touched.
- There have been some meetings and recommendations from the meetings on plan review streamlining that may have merit to implement.
- 1. Dissolve nonmetallic mining team. The only work beinge done on the team currently involved preparing the report to NRB and any policy questions which can be handled via email. The team has served it's purpose to help RA's start up their ordinance. Technical support can still be sought through regional contacts and central office without having a team.

If you have additional suggestions or comments on this subject, please include them below. Thanks!

Something I've done already – when local consultants have many hazardous waste generators as clients in one area, ask them along on a future inspection. I've done this with Kip Prahl who has hundreds of auto body shop clients and they have gone to all their clients and made major improvements in their clients hazardous waste handling practices. Now my inspection write ups for these clients are much shorter!